

NYE STIRLING HALE & MILLER, LLP

Jonathan D. Miller (CA 220848)

Alison M. Bernal (CA 264629)

jonathan@nshmlaw.com

alison@nshmlaw.com

33 West Mission Street, Suite 201

Santa Barbara, CA 93101

Telephone: (805) 963-2345

Facsimile: (805) 284-9590

Attorneys for Plaintiffs and the Class

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MEGAN SCHMITT, DEANA REILLY,
CAROL ORLOWSKY, and STEPHANIE
MILLER BRUN, individually and on
behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

YOUNIQUE, LLC,

Defendant.

Case No. 8:17-cv-01397-JVS-JDE

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR AWARD OF
ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION
EXPENSES TO CLASS COUNSEL AND
SERVICE AWARDS**

Complaint Filed: 8/17/17

Plaintiffs Megan Schmitt, Deana Reilly, and Stephanie Miller-Brun
("Plaintiffs") respectfully move this Court for an Order granting payment of
\$1,083,333.33 (one-third of the \$3,125,000 Settlement Fund¹) for Class Counsel's
attorneys' fees and \$152,744.79 for reimbursement of Class Counsel's litigation

¹ Any terms not otherwise defined herein have the same meaning as in the Class Settlement Agreement ("S.A."), attached as Exhibit A to the concurrently filed Declaration of Adam Gonnelli in support of Plaintiffs' Motion for Award of Attorneys' Fees and Reimbursement of Litigation Expenses to Class Counsel and Service Awards.

1 expenses. Plaintiffs further seek an order granting Service Awards of \$15,000 each
 2 to Plaintiffs Megan Schmitt, Stephanie Miller-Brun, and Deana Reilly, \$2,500 to
 3 Kristen Bowers, and \$500 each to Brenna Kelly-Starkebaum, Ashley Willey and
 4 Meagan Nelson for their efforts and contributions to this litigation.

5 In support of this motion, Plaintiffs rely upon the accompanying Memorandum
 6 of Law; the accompanying Declarations of Michael E. Hamer, Adam Gonnelli,
 7 Bonner C. Walsh, Alison M. Bernal, Davis Pastor, Thomas J. Hershewe, Phil LeVota
 8 and Edwin J. Kilpela, Jr. in support of Plaintiffs' motion; the supporting exhibits to
 9 the foregoing declarations; all the pleadings and documents on file in this action; and
 10 such other matters as may be presented at or before the hearing.

11 Respectfully submitted on this 18th day of November, 2019.

12 Dated: November 18, 2019

NYE, STIRLING, HALE & MILLER, LLP

13 By: /s/ Jonathan D. Miller

14 Jonathan D. Miller, Esq.
 15 Alison M. Bernal, Esq.
 16 33 W. Mission Street, Suite 201
 17 Santa Barbara, CA 93101
 18 Telephone: (805) 963-2345
 Facsimile: (805) 284-9590
jonathan@nshmlaw.com
alison@nshmlaw.com

19 Dated: November 18, 2019

CARLSON LYNCH

20 By: /s/ Edwin J. Kilpela, Jr.

21 Edwin J. Kilpela, Jr., Esq.
 22 1350 Columbia Street, Ste. 603
 23 San Diego, CA 92101
 Telephone: (619) 762-1900
 Facsimile: (619) 756-6991
tcarpenter@carlsonlynch.com

24
 25 *Additional Counsel Listed Below*
 26
 27
 28

1 Dated: November 18, 2019

THE SULTZER LAW GROUP P.C.

2 By: /s/ Adam Gonnelli

3 Adam Gonnelli, Esq.
280 Highway 35, Suite 304
Red Bank, NJ 07701

4 Telephone: (732) 741-4290
5 Facsimile: (888) 749-7747
gonnellia@thesultzerlawgroup.com

6 Dated: November 18, 2019

WALSH, PLLC

7 By: /s/ Bonner Walsh

8 Bonner Walsh, Esq.
9 1561 Long Haul Road
Grangeville, ID 83530
10 Tel: (541) 359-2827
Fax: (866) 503-8206

bonner@walshpllc.com

11
12 *Attorneys for Plaintiffs and the Class*
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28